

## REMARKS

### 1. Summary of the Office Action

In the Office Action mailed January 16, 2009, the Examiner rejected claims 65-88 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,175,789 ("Beckert").

### 2. Status of the Claims

Applicants have amended claim 81. No new matter has been added. Applicants respectfully submit that claims 65-88 are in condition for allowance and respectfully request notice to this effect. Of these claims, claims 65 and 81 are independent.

### 3. Response to Rejections

As noted above, the Examiner rejected claims 65-88 under 35 U.S.C. 102(e) as being anticipated by Beckert. Applicants submit that the prior art Beckert reference fails to disclose certain elements of the pending claims. As such, Applicants respectfully request reconsideration in view of the following remarks.

#### A. The Beckert Reference fails to disclose "coupling an OEM bus, an AMI-C bus, and an external network via a gateway device"

In claim 65, Applicants recite a method including "coupling an Original Equipment Manufacturer (OEM) bus, an Automotive Multimedia Interface Consortium (AMI-C) bus, and an external network via a gateway device." Applicants have amended claim 81 to clarify that the gateway device "couples the OEM bus, the AMI-C bus, and the external network."

In contrast, Beckert contemplates a single USB bus environment, and does not provide the interconnection described by the claim elements of claims 65 and 81. Peripheral devices in Beckert are connected to a single USB hub. (See, e.g., Beckert, Figure 2). Therefore, Beckert does not disclose coupling separate buses and an external network. The coupling as claimed allows for communication between the OEM bus, the AMI-C bus, and the external network, and the gateway provides added security. (See, e.g., Applicants' Specification, page 29, lines 11-21; Figure 10). The OEM bus provides a static, or at least more controlled, environment for OEM devices running vehicle system functions, whereas the AMI-C bus is intended to be more customizable, and to accommodate additional components. Coupling these buses via a gateway device may allow communication between devices on the separate buses as well as provide security between the buses. The claims recite these separate and distinct bus connections, and the coupling that is provided by the gateway device.

Because Beckert does not show or suggest coupling an OEM bus, an AMI-C bus, and an external network via a gateway device, Beckert does not show or suggest every element of claims 65 and 81. Accordingly, Applicants submit that Beckert does not anticipate claims 65 or 81. Furthermore, claims 66-80 and 82-88 depend from claims 65 and 81, respectively. Accordingly, Applicants submit that Beckert does not anticipate claims 66-80 and 82-88 for at least these same reasons described above with reference to claims 65 and 81.

In light of the above, Applicants respectfully request withdrawal of the rejections under 35 U.S.C. § 102(e).

**B. The Beckert Reference fails to disclose "authenticating devices connected to the AMI-C bus"**

Claim 65 recites a method including "authenticating devices connected to the AMI-C bus at the gateway device using an application processor." Similarly, claim 81 recites a gateway device including an "application processor . . . adapted to (i) authenticate AMI-C devices connected to the AMI-C bus."

Devices supported in the AMI-C bus may include, but are not limited to, pagers, video/audio, multimedia players/embedded processor, personal digital assistants, and wireless local area network (WAN) ports. (See, e.g., Applicants' Specification, page 15, lines 2-5). In some cases, the devices that attempt to connect with the AMI-C bus may be unauthorized. As mentioned in Applicants' specification:

The WINS vehicle internetwork gateway 302 is distinguished by the ability to control the flow of information between vehicle networks, and between these networks and external networks. . . .  
The port nodes 310 . . . enable security functions to prevent unauthorized or misbehaving device from disrupting the network. (Applicants' Specification, page 14, lines 21-27).

Therefore, a method in accordance with claim 65 and a gateway device in accordance with claim 81 may prevent unauthorized devices from disrupting the network.

In contrast, Beckert fails to disclose authenticating devices connected to the AMI-C bus at the gateway device using an application processor. Beckert discloses a computer system that includes a USB hub that provides connections to a plurality of peripheral vehicle devices. (See, e.g., column 5, lines 28-30; Figure 2). In the Office Action mailed January 16, 2009, the Examiner stated that Beckert disclosed authenticating devices connected to the AMI-C bus at the gateway device using an application processor. (Office Action, page 2). However, the Examiner failed to provide a specific citation to where this element is disclosed in Beckert. Applicants have studied the cited reference and do not find a disclosure of authenticating

devices connected to the AMI-C bus at the gateway device. Accordingly, Applicants submit that Beckert does not show authenticating devices connected to the AMI-C bus at the gateway device.

Further, Beckert does not suggest authenticating devices connected to the AMI-C bus at the gateway device. In fact, Beckert appears silent as to (i) the possibility of unauthorized peripheral devices connected to the USB hub of the vehicle control system and/or (ii) any sort of authentication of any of the peripheral devices. Rather, authenticating devices connected to the AMI-C bus at the gateway device using an application processor is disclosed only in Applicants' specification, but not recognized or appreciated by Beckert.

Because Beckert does not show or suggest authenticating devices connected to the AMI-C bus at the gateway device using an application processor, Beckert does not show or suggest every element of claims 65 and 81. Accordingly, Applicants submit that Beckert does not anticipate claims 65 or 81. Furthermore, claims 66-80 and 82-88 depend from claims 65 and 81, respectively. Accordingly, Applicants submit that Beckert does not anticipate claims 66-80 and 82-88 for at least these same reasons described above with reference to claims 65 and 81.

In light of the above, Applicants respectfully request withdrawal of the rejections under 35 U.S.C. § 102(e).

#### 4. Conclusion

In light of the above remarks, Applicants submit that the present application is in condition for allowance and respectfully request notice to this effect. The Examiner is requested to contact Applicants' representative below at 312-913-0001 if any questions arise or he may be of assistance to the Examiner.

Respectfully submitted,

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